

14:06:28 1 A. Yes.

06:36 2 Q. And so WALRSS doesn't have any information in  
14:06:39 3 it; it's just sort of a fancy e-mail system back and  
14:06:43 4 forth to NSS, right?

14:06:46 5 A. It's -- we provide the information A and Z,  
14:06:52 6 so, yes, I mean, it is -- there is no formula --

14:06:56 7 Q. It's not a database?

14:06:57 8 A. No, no database access.

14:07:01 9 Q. What information is obtained in the EXACT  
14:07:06 10 system?

14:07:06 11 A. I don't know.

14:07:07 12 Q. Have you ever heard of EXACT?

14:07:09 13 A. It was a billing system, but that's all I know  
14:07:12 14 about it.

14:07:14 15 Q. What about the LEX, L-E-X, or LASAR system?

14:07:18 16 A. I've never even heard of that.

14:07:20 17 Q. Never heard of it.

14:07:45 18 I'm sorry. One more time, to get access  
14:07:47 19 to TIRKS, how do you do it? You fill out a form and  
14:07:50 20 give it to somebody or how does that work?

14:07:53 21 A. There is a form that's authorized by your  
14:07:57 22 supervisor, yes, requesting it, and you put your  
14:08:02 23 business reason for --

14:08:03 24 Q. And presumably TIRKS is -- it's valid on a  
08:11 25 business basis for access account managers selling

14:08:14 1 special access circuits to the public to have access to  
 08:18 2 TIRKS, right?  
 14:08:20 3 A. There are valid reasons to have TIRKS, account  
 14:08:23 4 managers.  
 14:08:24 5 Q. And that's why you have it?  
 14:08:26 6 A. Yes.  
 14:08:27 7 Q. And you have testified there are certain  
 14:08:34 8 things that you won't look at in TIRKS, correct?  
 14:08:37 9 A. Correct.  
 14:08:38 10 Q. But there's no physical restriction keeping  
 14:08:40 11 you from looking at those things, is there?  
 14:08:43 12 A. Yes, correct.  
 14:08:44 13 Q. Is that correct?  
 14:08:44 14 And certainly if someone did not have  
 14:08:48 15 your same set of ethics, they may provide -- they may  
 14:08:52 16 use TIRKS to provide third-party information to their  
 14:08:56 17 customer?  
 14:08:56 18 A. It would be possible.  
 14:08:58 19 Q. Regarding available capacity at their customer  
 14:09:02 20 prem?  
 14:09:02 21 A. At any location.  
 14:09:03 22 Q. That's possible?  
 14:09:04 23 A. Yes.  
 14:09:07 24 Q. And certainly possible since no one at SWBT  
 09:13 25 has issued a guideline saying not to, correct?

14:09:16 1 A. Not to my knowledge.

14:09:18 2 Q. Okay. If Qwest wanted a facility to get to a

14:09:54 3 point that wasn't available, how would you let them know

14:09:57 4 what the closest available facility was?

14:10:00 5 A. It's -- it's not a response that I would -- I

14:10:06 6 would have any knowledge of.

14:10:07 7 Q. How can you use TIRKS to do that?

14:10:09 8 A. I don't know.

14:10:11 9 Q. You've never done that before?

14:10:13 10 A. No.

14:10:13 11 Q. You've never said, well, we are not there, but

14:10:16 12 we are here?

14:10:16 13 A. No.

14:10:18 14 Q. I imagine that response would not come back on

14:10:21 15 a WALRSS response, right?

14:10:23 16 A. They would only respond to the A and Z

14:10:29 17 locations on the request.

14:10:31 18 Q. On the WALRSS?

14:10:32 19 A. On the WALRSS.

14:10:33 20 Q. The TIRKS does not require an A and Z location

14:10:39 21 to be input, does it, to determine circuit? If you have

14:10:43 22 that ACTL identification, you don't need an A and Z loc,

14:10:50 23 do you?

14:10:51 24 A. To identify a circuit, you would need the

14:10:54 25 circuit ID. You can't query just on an ACTL code. If

14:10:59 1 you put the ACTL code in in a screen, you could find out  
 11:03 2 what facilities are to that location.  
 14:11:06 3 Q. Say that again. If you put the ACTL code and  
 14:11:10 4 what else?  
 14:11:11 5 A. In a screen, you would find out what  
 14:11:14 6 facilities are to that location.  
 14:11:15 7 Q. And it would give you -- the ACTL code would  
 14:11:22 8 govern Z location, right, the ending point of the  
 14:11:25 9 circuit, and it would give you all originating points,  
 14:11:27 10 all As?  
 14:11:28 11 A. If that was the Z location.  
 14:11:30 12 Q. Right, or vice versa?  
 14:11:32 13 A. Correct.  
 14:11:32 14 Q. So if you put in the ACTL code, you would end  
 14:11:36 15 up with a report that would give you every circuit that  
 14:11:40 16 has either its A or Z at that location, and then would  
 14:11:46 17 you see where the other end of the circuit was also?  
 14:11:50 18 A. Well, it would be on the designed -- on the  
 14:11:54 19 screen for the -- using the A and Z locations would only  
 14:12:01 20 provide you the MUX'd or channelized systems. It would  
 14:12:05 21 not give you the point to points.  
 14:12:13 22 Q. Are you saying TIRKS doesn't inventory point  
 14:12:17 23 to point?  
 14:12:17 24 A. I don't know how it inventories them. All I  
 12:21 25 know, if they write in the SCID, that I know of.

14:12:25 1 Q. What's a SCID?

12:28 2 A. SONET circuit ID. SONET facility.

14:12:35 3 Q. Right. As you testified earlier, every

14:12:39 4 circuit is in TIRKS one way or the other, right?

14:12:41 5 A. Yes.

14:12:42 6 Q. So it's in there somewhere you know?

14:12:44 7 A. Yes.

14:13:02 8 Q. If you want to find out the available capacity

14:13:04 9 on a route, say a DS3, and you're not going to use a

14:13:09 10 database, who would you call?

14:13:13 11 A. Can you ask the question again?

14:13:15 12 Q. Yes. If you want to find out the available

14:13:18 13 capacity on a route, say a DS3, and you're not going to

14:13:23 14 use a database, who would you call?

14:13:27 15 A. I would ask what the A and Z locations are and

14:13:31 16 submit a WALRSS case.

14:13:34 17 Q. Wouldn't it be faster to pick up the phone?

14:13:39 18 A. It may or may not be. I don't know. I would

14:13:42 19 think that it's -- I would not get a response if I just

14:13:49 20 picked up the phone and asked what capacity is from A

14:13:54 21 to Z or whatever.

14:13:55 22 Q. You're not going to get a response if you do

14:13:58 23 that?

14:13:58 24 A. No.

14:02 25 Q. Do you know Sally Rossman?

14:14:05 1 A. I met her yesterday.

14:08 2 Q. Okay. We had talked earlier about people that

14:14:19 3 help you, the project manager you may have on a deal,

14:14:25 4 other engineers. Explain to me the help that NSS gives

14:14:33 5 you directly with customers, other than through WALRSS.

14:14:41 6 A. NSS really has no interface with the customers

14:14:49 7 today. I mean, in my capacity --

14:14:53 8 Q. You've never gotten an NSS person on a

14:14:56 9 conference call with a customer?

14:14:56 10 A. I have.

14:14:57 11 Q. You have.

14:14:59 12 A. Yes.

14:15:00 13 Q. When was that conversation, about?

14:15:01 14 A. It was -- there are -- in the past there were

14:15:07 15 NSS people that were project managers.

14:15:10 16 Q. Uh-huh.

14:15:11 17 A. And in their capacity as project managers, I

14:15:15 18 was on the phone with them discussing implementation of

14:15:18 19 SONET rings or services that had been requested.

14:15:21 20 Q. And the customer would be on the phone also,

14:15:24 21 right?

14:15:24 22 A. Depending on the situation.

14:15:26 23 Q. There are times where you had the NSS project

14:15:30 24 manager in a meeting or on a conference call directly

15:33 25 with the customer, correct?

14:15:34 1 A. Yes.

15:35 2 Q. Okay. And you had that -- him or her on the  
14:15:38 3 call why?

14:15:40 4 A. Because they were the project managers of the  
14:15:42 5 service that was being ordered.

14:15:44 6 Q. And they brought knowledge to the situation,  
14:15:46 7 right?

14:15:46 8 A. Correct.

14:15:48 9 Q. And they would help field questions from the  
14:15:50 10 customers and answer those questions, right?

14:15:54 11 A. Regarding the topics that we were discussing  
14:15:57 12 on the call.

14:15:57 13 Q. Right, a particular build or a particular  
14:16:00 14 possible build. I mean, they have the information, you  
14:16:04 15 don't, right?

14:16:05 16 A. Well, that would be on builds in process.

14:16:08 17 Q. Builds in process, right, they have the  
14:16:11 18 information you don't, right?

14:16:13 19 A. They have access to the people. They know the  
14:16:15 20 people to access or to contact to get the information.

14:16:19 21 Q. And they can answer questions that you may not  
14:16:21 22 have the answer to, right?

14:16:23 23 A. Yes.

14:16:23 24 Q. Now -- but you've also -- isn't it correct  
16:27 25 that you've used network engineering project managers or

14:16:32 1 NSS -- other NSS people talking to customers before they  
 16:36 2 placed the order, talking about design layouts,  
 14:16:40 3 possibilities, options on the route, that type of thing?  
 14:16:46 4 A. There -- in certain offerings by Southwestern  
 14:16:52 5 Bell, there's never orders placed. They are done based  
 14:16:57 6 on an LOA signed by the customer saying, I want to have  
 14:17:02 7 an STN ring built at these three nodes.  
 14:17:10 8 Q. What does L-O-A stand for?  
 14:17:12 9 A. Letter of authorization.  
 14:17:13 10 Q. And that's then -- that's a different way to  
 14:17:15 11 order a special circuit?  
 14:17:18 12 A. In the STN world, there was never a physical  
 14:17:22 13 order placed by the customer.  
 14:17:23 14 Q. There was never a --  
 14:17:25 15 A. There was not. There was not an order placed.  
 14:17:30 16 They sign a contract with us or a letter of intent that  
 14:17:35 17 they are going to purchase whatever volume option  
 14:17:41 18 they're buying configured such and such.  
 14:17:43 19 Q. Right. So is it something where they commit  
 14:17:46 20 to it in that letter of agreement?  
 14:17:48 21 A. Yes.  
 14:17:48 22 Q. So they commit to buy a SONET ring for X  
 14:17:53 23 dollars for X months?  
 14:17:55 24 A. Correct.  
 17:55 25 Q. And at that point that's being discussed and



14:17:59 1 negotiated, it's not uncommon to have an NSS person in  
18:03 2 there helping you talking about the technical side?

14:18:06 3 A. Like I said, this is after a WALRSS case has  
14:18:09 4 been issued and we have gotten feedback from the WALRSS  
14:18:12 5 case.

14:18:12 6 Q. Right, but it's not an order level?

14:18:14 7 A. No, but there is a letter of intent signed  
14:18:19 8 or -- I mean, there is a commitment by the customer for  
14:18:23 9 this ring.

14:18:24 10 Q. So you're saying you've never involved an NSS  
14:18:28 11 person before they signed off on that letter --  
14:18:32 12 contract?

14:18:33 13 A. Correct.

14:18:37 14 Q. Why do SONET rings not use an ASR or an LSR or  
14:18:43 15 something like that?

14:18:44 16 A. That was the STN, it was a tariff offering  
14:18:48 17 that there was not a -- an order process for.

14:18:53 18 Q. It's one they hadn't designed an order  
14:18:56 19 process?

14:18:56 20 A. Right.

14:18:56 21 Q. Is that a situation where the access account  
14:18:59 22 managers said, by God, we are going to write something  
14:19:02 23 up and get this deal done?

14:19:04 24 A. No, it's the same as a -- you would make a  
19:09 25 proposal saying this is what it would cost.

14:19:12 1 Q. And they agreed to it by signing the bottom of  
19:14 2 it?  
14:19:14 3 A. Right.  
14:19:14 4 Q. But that's binding, though?  
14:19:17 5 A. Yes.  
14:19:17 6 Q. That's the only contract you'll ever have in  
14:19:19 7 the file?  
14:19:19 8 A. Yes.  
14:19:21 9 Q. Okay. Is that still the way it's done today?  
14:19:23 10 A. For STN, yes.  
14:19:24 11 Q. All SONET rings?  
14:19:26 12 A. No, just self-healing transport network, STN.  
14:19:40 13 Q. What's the difference between an STN and a  
14:19:43 14 SONET ring?  
14:19:44 15 A. A SONET ring can either be an STN or a  
14:19:50 16 dedicated ring or a SONET ring that acts as service.  
14:19:54 17 Physically the equipment is the same, but the dedicated  
14:19:59 18 ring is dedicated to the customer and STN is a shared  
14:20:03 19 ring.  
14:20:03 20 Q. So shared SONET rings use this letter contract  
14:20:08 21 to order the service?  
14:20:09 22 A. Yes.  
14:20:10 23 Q. Okay. What about having direct engineering  
14:20:15 24 assistance with sales calls?  
20:23 25 A. (Shakes head.)

14:20:24 1 Q. In 12 years you've never had engineers do  
 20:28 2 sales calls with you to customers?

14:20:30 3 A. No.

14:20:31 4 Q. That's your testimony?

14:20:32 5 A. As the account manager I'm the technical  
 14:20:34 6 support. I make the technical -- I make the tech -- I  
 14:20:37 7 am the technical person.

14:20:39 8 Q. Have you ever gotten an engineer on the phone  
 14:20:41 9 when you're trying to make a sale --

14:20:43 10 A. No.

14:20:43 11 Q. -- to discuss the issues?

14:20:45 12 A. No.

14:20:45 13 Q. I mean with the customer.

14:20:46 14 A. No.

14:20:46 15 Q. You've never brought an engineer to the  
 14:20:48 16 customer's office to discuss the matter?

14:20:52 17 A. Not for the sale, no.

14:20:54 18 Q. I'm talking about after the sale.

14:20:56 19 A. After the sale, if it's -- if the appropriate  
 14:21:02 20 engineer needs to be -- do a site visit at the customer  
 14:21:06 21 premise, or discuss relocation of equipment or whatever  
 14:21:12 22 the case may be, reconfiguration of equipment, then,  
 14:21:17 23 yes, I would have to have an engineer present, because  
 14:21:19 24 that would be their job responsibility to get that done.

21:25 25 Q. Have you ever just brought an engineer out to

14:21:30 1 a customer or potential customer meeting?

14:21:32 2 A. No.

14:21:33 3 Q. No?

14:21:34 4 A. No.

14:21:35 5 Q. Okay. What happens when you need a route for

14:21:54 6 a potential sale and the route is being built out, it's

14:21:57 7 still in progress, what do the engineers tell you?

14:22:01 8 A. They tell me --

14:22:02 9 MR. HARTLEY: Object, form.

14:22:05 10 A. The response is that the facilities are

14:22:08 11 available X date for this service.

14:22:11 12 Q. I'm sorry. I didn't hear you.

14:22:13 13 A. The response from the NSS or the WALRSS case

14:22:17 14 would come back facilities will be available whatever

14:22:20 15 time frame.

14:22:21 16 Q. Will be available, is that what you said?

14:22:23 17 A. Or would.

14:22:25 18 Q. Would be available.

14:22:26 19 So you want a path, they just happen to

14:22:31 20 be building it, it's one of those, they'll come back and

14:22:35 21 tell you it won't be available until this date?

14:22:37 22 A. Right.

14:22:38 23 Q. Or it will be available on this date?

14:22:40 24 A. Well, that's the expected service date.

14:22:42 25 Q. The expected service date, okay.

14:22:44 1 What about in situations where it's  
14:22:51 2 not -- construction has not started but it's part of a  
14:22:54 3 planned capacity expansion?

14:22:57 4 A. The response would be facilities will be  
14:23:01 5 available whatever time frame. It could be six months  
14:23:04 6 or whatever the case may be.

14:23:06 7 Q. Farther out?

14:23:07 8 A. Whatever the time frame is.

14:23:09 9 Q. Okay. Now, when you locate -- in a fiber  
14:23:51 10 situation, when you locate unused fiber on a route that  
14:23:54 11 you need for SWBT to serve your customer, is that fiber  
14:23:59 12 always spliced from point to point when you request it?

14:24:03 13 A. I don't locate fiber. It's the responsibility  
14:24:05 14 of some other organizations.

14:24:09 15 Q. Right. When you inquire or order a circuit  
14:24:15 16 and it involves fiber that's along a route that's  
14:24:19 17 being -- it's not being used at the time, is that fiber  
14:24:24 18 always spliced from point to point when you request it?

14:24:27 19 A. No.

14:24:29 20 Q. Why not?

14:24:31 21 MR. HARTLEY: Object to form.

14:24:33 22 A. The responses that I get back are we have to  
14:24:38 23 place X amount of fiber to get to the customer location,  
14:24:41 24 so obviously it's not spliced all the way through. In  
14:24:46 25 some cases there are splices required to other

14:24:52 1 locations.

14:24:53 2 Q. Well, I'm talking about situations where the  
14:24:55 3 fiber is already in place from the CO to the customer  
14:24:59 4 prem, but it may have -- it may need one or two or three  
14:25:03 5 splices, for instance.

14:25:05 6 A. I wouldn't know that.

14:25:12 7 Q. In those situations why would that dead count  
14:25:16 8 fiber not have already been spliced?

14:25:18 9 A. I would not know.

14:25:20 10 Q. Okay. Have you seen situations where that  
14:25:22 11 happens?

14:25:24 12 A. I'm not aware of any situations.

14:25:27 13 Q. You're not aware of any situations?

14:25:29 14 A. I mean, I don't deal with that aspect.

14:25:34 15 Q. When they say the facilities will be available  
14:25:36 16 in 90 days, for instance, is it your understanding that  
14:25:40 17 sometimes part of that 90 days would be involved in  
14:25:44 18 finalizing the fiber by splicing it?

14:25:47 19 A. That is correct.

14:25:51 20 Q. Why does SWBT not always splice the fiber it  
14:25:57 21 puts in the ground?

14:25:59 22 MR. HARTLEY: Object, form.

14:25:59 23 A. I have no knowledge.

14:26:01 24 Q. What do you think?

14:26:03 25 A. It's not my realm of expertise.

14:26:06 1 Q. Do you think that's a prudent decision?

26:08 2 A. It's not my call.

14:26:11 3 Q. I'm asking whether you think it's prudent. I  
14:26:14 4 know it's not your call.

14:26:16 5 A. I have no feelings one way or the other. I  
14:26:25 6 mean --

14:26:25 7 Q. Have you ever complained, you know, back to  
14:26:28 8 the engineers, why the hell don't you splice this stuff  
14:26:32 9 to begin with, then I wouldn't have to wait 90 days?

14:26:35 10 A. No.

14:26:36 11 Q. Is that an acceptable part of doing business  
14:26:38 12 to you?

14:26:38 13 A. That is somebody else's responsibilities and  
14:26:43 14 I've requested what -- they're advising me on what it  
14:26:50 15 will take to provide the service that's being ordered by  
14:26:55 16 my customer and the time frames required.

14:26:58 17 Q. All right. Have you ever discussed splicing  
14:27:03 18 issues with anyone on the NSS or engineering side of the  
14:27:08 19 house?

14:27:13 20 A. What do you mean by splicing issues?

14:27:15 21 Q. Has the word splicing ever come up in a  
14:27:19 22 conversation?

14:27:19 23 A. When we have kickoff calls, they can inform me  
14:27:24 24 at that time that we have to make two splices in order  
27:27 25 to provide the fiber for the service that's being

14:27:31 1 ordered.

14:27:31 2 Q. Uh-huh.

14:27:32 3 A. So that's the context in which splicing is  
14:27:36 4 brought up.

14:27:37 5 Q. Who tells you that, the NSS or the engineer or  
14:27:41 6 what?

14:27:41 7 A. The outside plant engineer.

14:27:42 8 Q. Do they generally advise you as to how many  
14:27:45 9 splices they're going to have to make?

14:27:47 10 A. If it's on the serving plan.

14:27:49 11 Q. The serving plan?

14:27:51 12 A. Right. They design the service, how far they  
14:27:54 13 have to place fiber and how many splices, but they do  
14:28:00 14 not always say how many splices are required.

14:28:02 15 Q. Is that serving plan a design layout?

14:28:06 16 A. It's a drawing of the -- how they're going to  
14:28:11 17 provision the service.

14:28:12 18 Q. Like a DWO?

14:28:14 19 A. I don't know what a DWO looks like.

14:28:16 20 Q. Do you get DLRs for your circuits?

14:28:19 21 A. After the -- once it's designed, yes. I don't  
14:28:23 22 receive them, the customer does.

14:28:25 23 Q. But the serving plan, it shows how many  
14:28:28 24 splices are required for your circuit?

14:28:30 25 A. Sometimes yes, sometimes no.



14:28:31 1 Q. Okay. I mean, has it ever been a big deal  
 28:37 2 between you and the engineers about the splicing?  
 14:28:39 3 A. No.  
 14:28:40 4 Q. That's an understood part of deploying fiber  
 14:28:43 5 to you?  
 14:28:45 6 A. I understand that splices have to be made to  
 14:28:50 7 provision the services.  
 14:28:53 8 Q. Okay. Would it be easier for you if they just  
 14:29:00 9 spliced all fiber end to end when they deployed in it  
 14:29:05 10 the ground?  
 14:29:06 11 A. That would be the call of the outside plant  
 14:29:08 12 planner on how to --  
 14:29:10 13 Q. Would it be easier to you is my question.  
 14:29:15 14 A. I don't think so.  
 14:29:16 15 Q. Why not?  
 14:29:22 16 A. It would be -- if fiber spliced all the way  
 14:29:28 17 through, then there would be no -- it would be dedicated  
 14:29:34 18 to wherever the end point is.  
 14:29:38 19 Q. Is there more flexibility leaving it  
 14:29:41 20 unspliced; is that what you're saying?  
 14:29:45 21 A. I would think so.  
 14:29:46 22 Q. Okay. I mean, is the current plan that they  
 14:29:53 23 don't splice it until they're ready to call it into  
 14:29:56 24 service?  
 14:29:57 25 A. I don't know.

14:29:57 1 Q. It sounds like that's been your experience;  
 14:30:00 2 they don't splice it until they're ready to call it into  
 14:30:04 3 service for your customer. Has that been your  
 14:30:07 4 experience, sir?  
 14:30:08 5 A. My experience is that they splice what's  
 14:30:11 6 required to provision for the service that's being  
 14:30:14 7 requested, yes.  
 14:30:14 8 Q. Do most of the circuits that they create for  
 14:30:18 9 your customers require splicing?  
 14:30:21 10 A. No.  
 14:30:22 11 Q. Most do not?  
 14:30:23 12 A. Correct.  
 14:30:26 13 Q. The OCN level circuits, do most of them  
 14:30:31 14 require splicing?  
 14:30:34 15 A. Most would require some splicing, yes.  
 14:30:38 16 Q. And that's for your customer, Qwest?  
 14:30:42 17 A. For my customer Qwest, Qwest orders.  
 14:30:58 18 Q. So is the point you're making that the DS3s  
 14:31:03 19 and DS1s typically don't require splicing?  
 14:31:06 20 A. Correct.  
 14:31:07 21 Q. But the OCN level circuits typically do  
 14:31:11 22 require splicing?  
 14:31:12 23 A. Because additional fiber is required to the  
 14:31:14 24 end user location.  
 14:31:15 25 Q. And that's why OCN level circuits typically

14:31:20 1 require splicing before you can serve your customer?

14:31:22 2 A. Correct.

14:31:22 3 Q. Your customer being Qwest?

14:31:25 4 A. Yes.

14:31:28 5 Q. You understand what diversity is, don't you?

14:31:30 6 A. Yes.

14:31:46 7 Q. Could you explain to us what route diversity  
14:31:50 8 is for a circuit?

14:31:55 9 A. For me, route diversity would be -- do you  
14:31:59 10 want at a system level or a circuit level?

14:32:05 11 Q. Let's start with system level.

14:32:08 12 A. System level route diversity on the services  
14:32:13 13 that my customer order requires a diverse -- diversity  
14:32:18 14 between the serving wire center and the premise based on  
14:32:25 15 two different paths to the location as close to it -- to  
14:32:31 16 the premise as possible.

14:32:33 17 Q. Through a single CO or two COs?

14:32:38 18 A. If it's a two-node ring, it would only be the  
14:32:44 19 local loop diversity. If it's an STN or a three-node  
14:32:49 20 ring, it would have diversity through a separate CO.

14:32:53 21 Q. So if at all possible, three or more nodes,  
14:32:58 22 it's SWBT policy to build system diversity through two  
14:33:04 23 COs?

14:33:05 24 A. Depending on the service requested, yes.

14:33:10 25 Q. And if there's only two nodes, meaning that

14:33:14 1 you have only one wire center serving the customer prem,  
14:33:17 2 then you would -- how would you obtain your diversity  
14:33:20 3 for that loop?

14:33:24 4 A. The diversity requested and Southwestern Bell  
14:33:30 5 outside plant engineer would design it as far as --  
14:33:34 6 diverse route as far as they can or as close as they can  
14:33:39 7 to the premise. If the customer only provides one  
14:33:42 8 entrance into the building, we can't have total  
14:33:45 9 diversity.

14:33:50 10 Q. All right. So if there's two or more demarcs,  
14:33:54 11 you try to bring them out of different sides of the  
14:33:56 12 building, right?

14:33:57 13 A. If the customer provides it.

14:33:59 14 Q. Right. If there's a single demarc or entrance  
14:34:04 15 to the building, you try to diversify the routes as much  
14:34:08 16 as possible, even though you have the same start and end  
14:34:11 17 point on the routes?

14:34:14 18 A. Usually the diversity is in -- at the entry to  
14:34:20 19 the premise.

14:34:21 20 Q. Meaning --

14:34:22 21 A. The single path into the building.

14:34:27 22 Q. What is the type of diversity that SWBT's  
14:34:30 23 customers prefer the most?

14:34:35 24 A. For my customer, they typically look at loop  
14:44 25 diversity.

14:34:45 1 Q. What does loop diversity mean?

14:34:48 2 A. That's a diverse path between the serving wire

14:34:52 3 center and the premise as far as possible.

14:34:56 4 Q. Does that mean single CO?

14:34:58 5 A. Single CO.

14:34:59 6 Q. And why does Qwest prefer a single CO?

14:35:05 7 A. Their -- most of their SONET rings are

14:35:10 8 two-node ring POP and serving wire center.

14:35:14 9 Q. And that's Qwest, but talking about SWBT's

14:35:17 10 customers overall, what's the preferred type -- maybe

14:35:26 11 I'm missing the different types of diversity, but of all

14:35:29 12 types of diversity, what type diversity is preferred the

14:35:35 13 most by customers ordering diversity?

14:35:37 14 MR. HARTLEY: Object, form.

14:35:38 15 A. I don't know. I don't have access to that

14:35:41 16 information.

14:35:41 17 Q. Why do customers want diversity?

14:35:46 18 MR. HARTLEY: Object, form.

14:35:48 19 A. My customer requests diversity to --

14:35:54 20 Q. Let me rephrase that. Why do customers tell

14:35:58 21 you they want diversity?

14:36:01 22 A. Well, my customer wants it to minimize the

14:36:05 23 points of -- single points of failure for their

14:36:09 24 services.

14:36:10 25 Q. Is that important?

14:36:11 1 A. To Qwest it is.

14:36:14 2 Q. Why?

14:36:15 3 A. Because they want to have the -- like I say,  
14:36:20 4 they lower their potential failure rates.

14:36:23 5 Q. And why is that important for them?

14:36:25 6 A. Because they have customers that they serve  
14:36:28 7 and they want to provide as good a quality service as  
14:36:32 8 possible.

14:36:33 9 Q. And the quality of service meaning overall  
14:36:37 10 uptime for their circuits?

14:36:39 11 A. Yes, availability.

14:36:41 12 Q. Availability. And telecom carriers don't want  
14:36:48 13 their circuits to be unavailable to their customers, do  
14:36:51 14 they?

14:36:52 15 A. Well, like I say, my customer doesn't. They  
14:36:55 16 want it --

14:36:55 17 Q. Can you not talk about other telecom carriers  
14:36:59 18 wanting to keep their circuits up, sir?

14:37:02 19 A. Well, I only deal with my customer and  
14:37:05 20 customers I've had. I can't talk as an overall telecom  
14:37:10 21 industry. I'm not the --

14:37:12 22 Q. You don't think all telecom carriers want to  
14:37:16 23 keep their service up for their customers,  
14:37:19 24 Mr. Cunningham?

14:37:20 25 A. I would assume so.

14:37:26 1 Q. And part of keeping the circuit up is  
 14:37:29 2 minimizing the chance that you lose service based on  
 14:37:32 3 something like a fiber cut, correct?

14:37:34 4 A. Correct.

14:37:35 5 Q. And one way to eliminate losing your service  
 14:37:40 6 based on a fiber cut is to have your SONET ring with  
 14:37:45 7 different routes, correct?

14:37:47 8 A. As diverse as possible.

14:37:49 9 Q. As diverse as possible. The more diverse you  
 14:37:54 10 can get them the better, right?

14:37:56 11 A. I wouldn't say the more the better, but  
 14:37:58 12 diversity --

14:37:59 13 Q. On the margin, the more diverse you can get  
 14:38:02 14 them the better it is, right? In case there's an  
 14:38:06 15 explosion, you want to get that other line as far away  
 14:38:10 16 from the first one as possible, right?

14:38:12 17 A. Yes.

14:38:13 18 Q. And so generally that will mean that having --  
 14:38:16 19 if you've got a three-node or greater ring, having your  
 14:38:21 20 diversity be at two different wire centers is better  
 14:38:24 21 than going through the same wire center, correct?

14:38:27 22 A. Yes.

14:38:30 23 Q. In fact, it's SWBT policy to provide diversity  
 14:38:36 24 when building a SONET ring if at all possible, correct?

14:38:41 25 A. Depending on the service being ordered. On

14:38:45 1 STN it requires an alternate CO. On a SONET -- a  
 14:38:52 2 dedicated ring, two COs is not a requirement.  
 14:39:02 3 Q. Dedicated ring being more of a special service  
 14:39:06 4 offered to that customer?  
 14:39:07 5 A. They are both special service offers.  
 14:39:10 6 Q. Well, a dedicated ring is just for that  
 14:39:12 7 customer, right?  
 14:39:12 8 A. Yes.  
 14:39:13 9 Q. SWBT's building an STN ring with the  
 14:39:16 10 understanding that it's going to serve more than one  
 14:39:20 11 customer on that ring, correct?  
 14:39:20 12 A. It's a shared ring.  
 14:39:22 13 Q. It's a shared ring so they're going to serve  
 14:39:25 14 more than one customer, correct?  
 14:39:26 15 A. Potentially.  
 14:39:27 16 Q. That's the plan when they build it, right?  
 14:39:31 17 A. The plan is to --  
 14:39:32 18 Q. Hence the term shared ring?  
 14:39:35 19 A. It's whether or not it's used, but, yes, it's  
 14:39:39 20 deployed with the understanding that there's excess  
 14:39:43 21 capacity.  
 14:39:43 22 Q. And that they plan on making that available to  
 14:39:46 23 other customers, correct?  
 14:39:47 24 A. Yes.  
 14:39:49 25 Q. And in that situation, which happens quite



14:39:52 1 often, SWBT policy is to require that alternate CO  
 14:40:01 2 diversity be used?

14:40:02 3 A. In the STN, yes.

14:40:04 4 Q. Okay. How do you help the customer -- how do  
 14:40:08 5 you help the customer understand the route and path of a  
 14:40:12 6 circuit?

14:40:17 7 A. We do not give them the physical path. We let  
 14:40:21 8 them know how far the -- how far diverse it is between  
 14:40:26 9 their location. We say it's diverse up until the  
 14:40:29 10 manhole outside of your building.

14:40:36 11 Q. A minute ago you told me that the DLR  
 14:40:40 12 information is provided directly to the customer.

14:40:43 13 A. Correct.

14:40:44 14 Q. Okay. So customers are provided a design  
 14:40:48 15 layout record that indicates the route and path for  
 14:40:52 16 their circuit, correct?

14:40:54 17 A. It gives them the cable pairs being used, yes.

14:40:58 18 Q. And the drop points?

14:41:00 19 A. And the drop points.

14:41:01 20 Q. If their circuit goes through three COs,  
 14:41:05 21 that's indicated on the design layout record provided to  
 14:41:10 22 the customer, correct?

14:41:11 23 A. On the circuit design, yes.

14:41:14 24 Q. So there is circuit documentation, there is  
 14:41:18 25 circuit design documentation provided to the customer